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Attorneys for Defendant,
ANDRÉS LOPEZ erroneously sued as
ANDY LOPEZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BRANDY OLMSTED,

Plaintiff,

v.

FOUNDATION PARTNERS GROUP,
LLC, a Delaware Corporation; ANDY
LOPEZ, an Individual, inclusive,

Defendants.

Case No: 2:21-CV-01547-MCE-DMC
*[Honorable Morrison C. England, Jr.,
Courtroom 7]*

(Related Cases)

**STIPULATION REGARDING DEADLINES
AND ORDER**

Complaint Filed: August 27, 2021
Trial Date: None Set

GENE PAUL NELSON, NICOLE
NELSON

Plaintiff,

v.

FOUNDATION PARTNERS GROUP,
LLC, A Delaware Corporation, ANDY
LOPEZ, An Individual, inclusive, and
DOES 1 through 50, INCLUSIVE,

Defendants.

Case No. 2:21-cv-01738-MCE-DME

Complaint Filed: September 24, 2021
Trial Date: None Set

1 WHEREAS, on October 13, 2022, Defendant ANDRES LOPEZ, erroneously
2 sued as ANDY LOPEZ ("Lopez") filed Renewed Motions to Stay the Civil Action Pending
3 Resolution of the Criminal Proceedings ("Motions to Stay") in the Related Cases.

4 WHEREAS, on December 6, 2022, after receipt of the Joint Request for Ruling
5 on Requests for Scheduling Order in Nelson Action, Modification of Scheduling Order
6 in Olmsted Action, and Stipulation on Deadlines, this Court issued Orders setting dates
7 and deadlines in the Related Cases as follows:

8 Fact Discovery completed within 9 months from this Court's
9 ruling on the Renewed Motion for Stay in both actions.
10 Designation of Expert Witnesses due within 60 days after the
11 close of fact discovery in both the Nelson Action and the
12 Olmsted Action. Rebuttal Expert Witnesses due by 30 days
13 after the designation of expert witnesses in both the Nelson
14 Action and the Olmsted Action. Expert discovery completed
by 120 days after expert witnesses are designated in the
Nelson Action and the Olmsted Action. Dispositive motions
due within 180 days after the close of fact discovery in the
Nelson Action and the Olmsted Action.

15 WHEREAS, on February 6, 2023, Lopez filed Notices of Withdrawal of the
16 Motions to Stay. Therefore, no rulings will be issued with respect to the Motions to Stay
17 to trigger the deadlines referenced in this Court's Orders, dated December 6, 2022.

18 IT IS HEREBY STIPULATED and agreed by and between Plaintiffs BRANDY
19 OLMSTED, GENE PAUL NELSON, and NICOLE NELSON, and Defendant
20 FOUNDATION PARTNERS GROUP, LLC, and Lopez, by and through their respective
21 counsel of record, as follows:

- 22 1. Fact Discovery in both cases shall be completed within 9 months from the
23 date the Court signs an Order on this Stipulation Regarding Deadlines;
- 24 2. Designation of Expert Witnesses shall be due within 60 days after the
25 close of fact discovery;
- 26 3. Rebuttal Expert Witnesses shall be due by 30 days after the designation
27 of expert witnesses;

28 ///

4. Expert discovery shall be completed by 120 days after expert witnesses are designated; and

5. Dispositive motions shall be due within 180 days after the close of fact discovery.

FISHER & PHILLIPS LLP

Dated: March 10, 2023

By: /s/ Collin D. Cook

Collin D. Cook
Amaris M. Stich
Attorneys for Defendant
ANDRES LOPEZ erroneously sued as
ANDY LOPEZ

THE VELEZ LAW FIRM, PC

Dated: March 10, 2023

By: /s/ Mark P. Velez

Mark P. Velez
Natalya V. Grunwald
Attorneys for Plaintiff
BRANDY OLMSTED, GENE PAUL
NELSON, AND NICOLE NELSON

JACKSON LEWIS P.C.

Dated: March 10, 2023

By: /s/ *Asha J. Lopez*

Carolyn G. Burnette
Asha J. Lopez
Attorneys for Defendant
FOUNDATION PARTNERS GROUP,
LLC

ORDER


The Court having considered the Stipulation Regarding Deadlines filed by Plaintiffs BRANDY OLMSTED, GENE PAUL NELSON, and NICOLE NELSON, and Defendants FOUNDATION PARTNERS GROUP, LLC and ANDRES LOPEZ, erroneously sued as ANDY LOPEZ, and other supporting evidence and papers, and good cause appearing therefor,

IT IS HEREBY ORDERED that:

1. Fact Discovery in both actions shall be completed within 9 months from the date that this Court signs this Order;
2. Designation of Expert Witnesses shall be due within 60 days after the close of fact discovery;
3. Rebuttal Expert Witnesses shall be due by 30 days after the designation of expert witnesses;
4. Expert discovery shall be completed by 120 days after expert witnesses are designated; and
5. Dispositive motions shall be due within 180 days after the close of fact discovery.

IT IS SO ORDERED.

Dated: March 15, 2023


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE